UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

952331

Subject: **POLREP #15**
Progress
Pilsen Soil Operable Unit 2 Residential
C5N8RV02
Chicago, IL

To: Bruce Everetts, Illinois EPA
Mark Johnson, ATSDR
Vicente Sanchez, Alderman Solis (Chief of Staff)
Dave Graham, Chicago Dept. of Health
Terry Sheahan, Chicago Dept. of Health
Doug Ballotti, USEPA
Samuel Borries, EPA Region 5
Blaine Kinsley, IL EPA
Peachey Robert, EPA Region 5
EOC HQ, EPA HQ

From: Ramon Mendoza, On-Scene Coordinator
Date: 12/21/2017
Reporting Period: 11/20/2017 to 12/21/2017

1. Introduction

1.1 Background

Site Number:	C5N8RV02	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	8/3/2015
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	2
Mobilization Date:	12/19/2016	**Start Date:**	12/20/2016
Demob Date:		**Completion Date:**	
CERCLIS ID:	ILN000504472	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

This time critical removal action is a PRP lead under an EPA Unilateral Administrative Order.

1.1.2 Site Description

Pilsen Soil Operable Unit 2 (OU2) Residential Site : Operable Unit (OU) 2 is a residential area bounded by West 18th Place to the north, a north-south alley between South Allport Street and South Racine Avenue to the east, West 21st Street to the south, and South Loomis Street to the west. There are about 178 residential properties in this 25-acre OU2 site. About 116 of the properties have non-permanent covers in their yards such as bare soil, grass or gravel and are the focus of EPA actions. In 2010, approximately 1,563 people lived within the boundaries of the Site, and the residential yards have high accessibility to sensitive populations including young children and pregnant women.

1.1.2.1 Location Chicago, Illinois 60608

See Site Description

1.1.2.2 Description of Threat

The lead concentration in surfaces soils are above the EPA screening level of 400 mg/kg lead in residential yards and gardens. Residents living in these homes may be exposed to the lead in these surface soils.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA conducted Site Assessment activities in 2013 to 2015 with additional residential parcels in 2016 sampled. Lead was found in surface soils in the residential yards and gardens above the EPA removal management level of 400 parts per million. The average Site surface soil lead concentrations were 1,412 mg/kg. There is an estimated population of around 1,563 people including children living, walking, working, and playing on the contaminated surface soils in the Site. These people have a high accessibility to residential yards including sensitive populations such as young children and pregnant women. EPA's risk assessment concluded that the soil concentrations of lead at the Site are at an unacceptable risk level to the residents accessing the Site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Initial residential soil cleanup work was conducted from, 12/20 - 23, 2016. After taking a break from the winter season, residential yard cleanup was restarted on April 24, 2017. EPA OSC and START provided part time oversight of removal activities on site, collected soil samples as needed, and conducted XRF analysis as needed. GHD (H.Kramer's contractor) had representatives on-site to oversee the removal work. Removal work was also conducted by GHD's contractor RW Collins. START and/or EPA OSC, documented property specific removal activities by recording field notes and by taking photographs. Air monitoring as required by OSHA was conducted by GHD.

2.1.2 Response Actions to Date: The following work was conducted from 11/20/2017 to 12/21/2017 (Work through 11/17/2017 is documented in POLREPs #1 to #14). Cleanup was conducted and complete at 7 homes/parcels during this period. As of the date of this POLREP, 54 homes/parcels have been cleaned up (2 were remediated by owners).

Work was conducted after H. Kramer's contractor (GHD) contacted the owners and agreed on a scope of work in writing. Below is a removal status summary of each of the properties. All 7 properties were 3-4 ft. below the street level with limited access, which made excavation work more difficult and time consuming. GHD conducted project management, particulate air monitoring during excavation and backfill activities at the residential and soil staging areas. RW Collins contractor/laborers conducted the physical work of excavation and backfilling of soil and also managed the soil at the H. Kramer property staging area.

In general, unless noted for each home, lead contaminated soil was excavated by hand with shovels and fed into a vacuum hose to the vacuum truck. After it was filled the truck was driven to the soil staging area at H. Krame'sr truck yard and the soil was transferred to steel containers, which are then transported for disposal to a solid waste landfill (Waste Management, Laraway) in Joliet IL. For backfilling, clean soil was transferred from the flatbead truck to the yard by conveyor belts, shovels and wheelbarrows to backfill. An orange fence marker was placed at the bottom of the excavation before backfilling. Final surface cover could be gravel, soil, or sod (new grass), depending on the owner preference.

Air monitoring at the homes and staging area did not show violations of the OSHA PEL criteria during this reporting period. . Workers wore level D with rubber booties and gloves during excavation of lead contaminated. GHD provided a boot wash to protect workers and minimize soil migration outside of the work area.

Home at Non-Responsive **week of 11/20 -11/22** - Work was conducted in the backyard. Excavation was carried out with a mini-excavator and the soil loaded to a dump truck using conveyor belts. The garden excavation went down to two feet. The grass area and area under stairs was excavated one foot. At the owner request, gravel was used to backfill under the porch/stairs .

Home at Non-Responsive **week of 11/27 - 11/30** - Work was conducted in the backyard. Excavation was carried out using hand tools/wheelbarrow and soil vac truck. The grass area was excavated 1 foot from original grade and backfilled with clean soil and sod top layer. The garden area was excavated two feet and backfilled with clean soil.

Second Home at Non-Responsive **week of 12/1 to 12/4** - Work was conducted in the backyard..A yard was excavated down to one foot using a soil vac truck. Temperature are below freezing at the site which slowed progress. The owner requested that only clean soil be used as backfill. Work was completed on 12/4. One of the tenants was upset whe was not notified by the owner regarding the work. She indicated that her child tested positive for lead. The OSC contacted and referred her to the Dr. Johnson at the ATSDR.

Third Home at Non-Responsive **week of 12/5 to 12/6** - Work was conducted in the front yard. Front yard including area under the stairs was excavated down to one ft and replaced with clean gravel per request from the owner.

Non-Responsive **week of 12/1 to 12/4** - Work was conducted in the backyard. Crews excavated a 1 foot deep strip of soil in the backyard next to the concrete driveway and backfilled with clean gravel per request from the owner.

Non-Responsive **week of 12/7 to 12/13** - Work was conducted in the backyard and front area. Soil vac truck was not working due to freezing temperatures. Crews excavated the backyard by hand to one foot and used conveyor belts to excavate and backfilled with clean soil. The conveyor belts were decontaminated prior to the backfill. It was too cold to lay down sod so a straw grass seed germination blanket was installed so the yard will regrow in the Spring with grass. A three foot wide strip of soil (with trees, no access and not a yard) in the front of the building was cleaned of debris and scraped down by 3 inches and replaced with clean soil per request by OSC and Owner.

4th home at Non-Responsive **12/14-12/21** - Work was conducted in the front and backyard. Soil vac was used because of above freezing temperatures. The front-yard was excavated to one foot in the grass area and 2 feet in garden (bushes were saved per owner request). Side areas (non-yard limited access) were scraped and backfilled with clean gravel and soil. A straw grass seed germination blanket was placed on the front yard to control erosion and grow grass in the Spring. The backyard was excavated to one ft. and replaced with clean soil per owner request (no sod or grass).

Crews cleaned up the soil staging area on 12/22 and secured for the winter.

Media Interest: There was no media interest during the reporting period.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

During EPA's Removal Site Evaluation (2013-14), H. Kramer & Co. was identified as a significant contributor to the lead found in surface soils in the residential parcels at the Site, due to historical fugitive air emissions of dust which contained lead (slag and zinc oxide). The response work is being overseen by EPA/START contractor and is being conducted by H. Kramer's contractors under a Unilateral Administrative Order (UAO) issued by the USEPA (Sept. 2016). Previous sampling work was conducted from April to June 2016 by H. Kramer's contractors at the Site under an EPA (CERCLA Administrative Order on Consent; to determine the amount of homes above the lead screening level of 400 mg/kg which needed to be cleaned up.

2.1.4 Progress Metrics :

As of Dec.21, 2017, 54 residential parcels have undergone cleanup and completed or have been removed from the cleanup list.

During the reporting period, 94.18 tons of lead contaminated soil was disposed. As of the week of Dec. 22, 2017. H Kramer's contractors have disposed of 767.17 tons of non-hazardous lead contaminated soil to the solid waste landfill facility in Joliet, IL.; since excavations of parcels were initiated in Dec. 2016.

Waste Stream	Medium	Quantity (in tons)	Manifest /Ticket#	Treatment	Disposal
Soil		10.16	851385		Laraway RDF, Waste Management, Joliet, IL. Shipped 12/22/2016
Soil		9.42	889972		Laraway RDF, Waste Management, Joliet, IL. Shipped 4/26/2017
Soil		11.98	890592		Laraway RDF, Waste Management, Joliet, IL. Shipped 4/27/2017
Soil		12.39	891212		Laraway RDF, Waste Management, Joliet, IL. Shipped 4/28/2017
Soil		7.95	894904		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/08/2017
Soil		11.98	896484		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/10/2017
Soil		13.78	898993		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/16/2017
Soil		13.71	900453		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/18/2017
Soil		11.89	900819		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/19/2017
Soil		10.49	901772		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/23/2017
Soil		10.92	902005		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/23/2017
Soil		9.66	902633		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/24/2017
Soil		10.65	904544		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/31/2017
Soil		11.78	904744		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/31/2017
Soil		12.69	915148		Laraway RDF, Waste Management, Joliet, IL. Shipped 6/20/2017
Soil		10.51	912918		Laraway RDF, Waste Management, Joliet, IL. Shipped 6/19/2017
Soil		12.71	923037		Laraway RDF, Waste Management, Joliet, IL. Shipped 7/17/2017
Soil		14.29	923543		Laraway RDF, Waste Management, Joliet, IL. Shipped 7/18/2017
Soil		12.56	925351		Laraway RDF, Waste Management, Joliet, IL. Shipped 7/21/2017
Soil		13.33	925625		Laraway RDF, Waste Management, Joliet, IL. Shipped 7/24/2017
Soil		13.62	926172		Laraway RDF, Waste Management, Joliet, IL. Shipped 7/25/2017
Soil		14.09	926615		Laraway RDF, Waste Management, Joliet, IL. Shipped 7/26/2017
Soil		12.76	927883		Laraway RDF, Waste Management, Joliet, IL. Shipped 7/27/2017
Soil		13.66	933810		Laraway RDF, Waste Management, Joliet, IL. Shipped 8/14/2017
					Laraway RDF, Waste

Soil		15.47	935594		Management, Joliet, IL. Shipped 8/17/2017
Soil		13.76	941816		Laraway RDF, Waste Management, Joliet, IL. Shipped 9/1/2017
Soil		15.33	940041		Laraway RDF, Waste Management, Joliet, IL. Shipped 8/29/2017
Soil		13.09	941952		Laraway RDF, Waste Management, Joliet, IL. Shipped 9/5/2017
Soil		14.16	945518		Laraway RDF, Waste Management, Joliet, IL. Shipped 9/6/2017
Soil		15.14	945956		Laraway RDF, Waste Management, Joliet, IL. Shipped 9/12/2017
Soil		15.12	946578		Laraway RDF, Waste Management, Joliet, IL. Shipped 9/13/2017
Soil		11.39	94880		Laraway RDF, Waste Management, Joliet, IL. Shipped 9/18/2017
Soil		12.12	959184		Laraway RDF, Waste Management, Joliet, IL. Shipped 9/20/2017
Soil		13.69	951525		Laraway RDF, Waste Management, Joliet, IL. Shipped 9/22/2017
Soil		12.51	953264		Laraway RDF, Waste Management, Joliet, IL. Shipped 9/27/2017
Soil		16.95	961224		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/10/2017
Soil		18.71	961440		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/10/2017
Soil		18.48	961668		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/10/2017
Soil		15.39	963390		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/13/2017
Soil		13.12	963391		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/13/2017
Soil		16.15	963537		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/13/2017
Soil		17.77	963538		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/13/2017
Soil		19.90	963853		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/16/2017
Soil		13.50	966082		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/19/2017
Soil		15.19	967586		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/24/2017
Soil		12.98	968461		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/26/2017
Soil		14.10	969072		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/27/2017
Soil		13.89	970192		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/30/2017
Soil		13.73	970505		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/30/2017
Soil		14.37	970785		Laraway RDF, Waste Management, Joliet, IL. Shipped 10/31/2017
Soil		12.82	976978		Laraway RDF, Waste Management, Joliet, IL. Shipped 11/10//2017
Soil		13.11	980304		Laraway RDF, Waste Management, Joliet, IL. Shipped 11/16//2017
Soil		13.19	985773		Laraway RDF, Waste Management, Joliet, IL. Shipped 11/28//2017

Soil		14.7	985773		Laraway RDF, Waste Management, Joliet, IL. Shipped 11/28//2017
Soil		13.19	985957		Laraway RDF, Waste Management, Joliet, IL. Shipped 11/29//2017
Soil		13.94	988543		Laraway RDF, Waste Management, Joliet, IL. Shipped 12/04/2017
Soil		13.23	990500		Laraway RDF, Waste Management, Joliet, IL. Shipped 12/06/2017
Soil		13.16	992436		Laraway RDF, Waste Management, Joliet, IL. Shipped 12/08/2017
Soil		13.74	996636		Laraway RDF, Waste Management, Joliet, IL. Shipped 12/15/2017
Total		**767.17 tons**			

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Response Actions have temporarily been stopped for the Winter. H. Kramers contractors will plan on resuming cleanup at more homes/yards in April 2018.

2.2.1.2 Next Steps:

Planning meeting have been scheduled with H. Kramer contractor GHD to discuss the work completed and work to be performed under the EPA Order. EPA OSC plans to right letters to the owners over the Winter notifying them that response actions have been completed.

2.2.2 Issues :

Winter conditions make it unsafe and unfeasible to continue removal and replacement of lead contaminated soil and the OSC has agreed to temporarily stop the work until April 2018.

2.3 Logistics Section

Work this period was supported by a 4 laborer(includes one operator0, forman, technical engineer and OSC.
Equipment includes one pickup truck, one dump truck, one skid steer, two 20 yard containers, one soil vac truck , three 10 fot conveyou belts, and hand dig tools.

2.4 Finance Section

2.4.1 Narrative

The START total budget ceiling is currently $120,000. Of this amount, approximately $ 81,743.09 (as of Dec.20, 2017) has been spent overseeing the responsible party contractor removal activities, overseeing responsible party contractor sampling activities, and collecting/analyzing soil samples under the EPA Administrative Order on Consent. Additional funds were utilized for technical support for the Unilateral Administrative Order for the Site. This additional budget is estimated to fund START's continued oversight work and cleanup support through winter shut down and starting up in April or May 2018.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	$120,000.00	$81,743.00	$38,257.00	31.88%
Intramural Costs				
Total Site Costs	$120,000.00	$81,743.00	$38,257.00	31.88%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Ramon Mendoza, EPA OSC;
Walt Pochron, Ivan Navarro; GHD (H. Kramer contractor)

2.5.2 Liaison Officer

EPA Community Relations: Heriberto Leon

2.5.3 Information Officer

EPA PIO: Francisco Arcaute, Rachel Bassler

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

City of Chicago, Alderman Solis Office
City of Chicago Dept. of Public Health;
Illinois EPA
ATSDR

4. Personnel On Site

Pilsen OU2 Removal – Personnel Counts
Notes: START is EPA's oversight contractor
GHD and RW Collins are H. Kramer Contractors.

Date	EPA	GHD	RW Collins	EPA/START	
11/20 to 12/22/2017	1 OSC Visit the site 3 to 4 days /week oversight	1	5	1 (present onsite on as needed basis at this time.)	

Note: All personnel have temporarily demobilized from the Site for the Winter.

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

https://www.epa.gov/il/pilsen-area-soil-site

6.2 Reporting Schedule

POLREPS will be issued every two weeks as appropriate.

7. Situational Reference Materials

See link for the Site at: https://www.epa.gov/il/pilsen-area-soil-site


RW ROLLING CO